

UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : NO. 24-03264-HWV
Irene Papoutsis Mulkerin :
Debtor : Chapter 7

TRUSTEE'S OBJECTION TO MOTION OF ANDREW WILLIAM MULKERIN
FOR LEAVE TO INTERVENE

AND NOW, comes the Trustee, by his attorney, Steven M. Carr, Esquire, of the law firm of Ream, Carr, Markey & Woloshin, LLP, and files this Motion to Dismiss Objection of which the following is a statement:

1. Movant is the duly appointed Trustee in the above-captioned Bankruptcy.
2. On July 21, 2025, Trustee's filed a Notice of Abandonment with regard to Debtor's interest in the Andrew V. Papoutsis Family Partnership ("FLP").
3. On August 4, 2025, Andrew William Mulkerin ("Mulkerin") filed an objection to the Trustee's proposed abandonment, and on August 5, 2025 filed a Motion for Leave to Intervene.
4. Mulkerin is the spouse of the Debtor.
5. Mulkerin does not have an ownership interest in the asset.
6. Mulkerin is not a creditor of the Debtor.
7. Mulkerin is not an interested party as he lacks any stake in the proceeding as to whether the Trustee should abandon an asset that has no benefit to unsecured creditors (given that Trustee has already liquidated sufficient assets as to be able to pay all creditors in full).
8. Mulkerin's interest, if any, is adequately represented by the Debtor already in case.
9. Mulkerin's attempt to intervene is pretextual and an attempt to engage in the

unauthorized practice of law on behalf of his wife by the ruse of a *pro se* entry into the proceedings.

WHEREFORE, Trustee prays that the Court deny the Motion to Intervene.

Ream, Carr, Markey Woloshin & Hunter, LLP

/S/ Steven M. Carr
Steven M. Carr, Esquire
Attorney for Trustee
119 East Market Street
York, PA 17401
(717) 843-8968
I.D. #34336